

# EXHIBIT F



2800 EAST GRAND RIVER AVENUE  
SUITE B  
LANSING, MICHIGAN 48912  
OFFICE - 517.292.7000  
FAX - 866.475.4449  
ZEINEHLAW@GMAIL.COM

October 19, 2019

Mr. David Rogers  
Mrs. Alaina Devine  
Campbell, Conroy & O'Neill, P.C.  
1 Constitution Wharf, Suite 310  
Boston, MA 02129

Re: July 25, 2019  
Rule 45 Subpoena - Daugherty Johnson  
Amended Response to Rule 45 Subpoena  
Supplemental Disclosures

Dear Mr. Rogers and Mrs. Devine:

In follow up from your October 7, 2019 email and phone conference, please see below.

1. I wanted to be clear, I provided an approximation of the number of pages of 1 million to 2 million pages. I did not want semantics to interfere with my message. I approximate the Document count to be around 300,000 with multiple pages often included in each document. This is an estimate and not an exact figure.

I indicated that we are not waiving any other privilege asserted and I am not in concurrence that we narrowed our assertion of privilege to those two specific areas. Though the two areas were majority of the discussion, I stand by our original preservation of the objections identified.

More so to the point, previously disclosed in the initial reply was the transcript where Mr. Flood of the OSC advised that all materials provided to Defendants was privileged under MCL 767A.8. (Bate Stamp DJ PROD Rule 45 Sub 9\_23\_2019\_000015) Attached please find the most recent communication with the Michigan Attorney General Office of the Solicitor General dated October 14, 2019. Accordingly, any materials provided during the course of the criminal case against Mr. Johnson are protected under statutory/legislative privileges and we are withholding disclosure of that material.

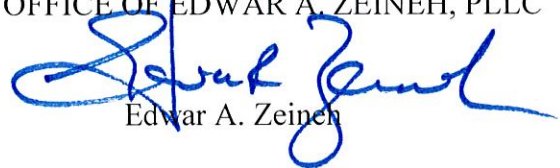
2. We have diligently searched for a signed Cooperation Agreement relating to Mr. Johnson. We are supplementing the disclosure to include two proposed "Proffer Agreements". These are unsigned copies. The "Proffer Agreement" dated in 2016 was not entertained and remained unsigned. The November 7, 2017 "Proffer Agreement" we believe is in the possession of the Office of Special Counsel and/or Office of the Solicitor General. We are unable to locate a signed copy in our possession.

3. I have attached the Authorization for Personnel File signed by Mr. Johnson which is subject to the Protective Order filed under case 5:16-cv-10444-JEL-MKM on 12/19/2017 under Doc # 299.
4. Mr. Johnson certifies, in responding to the subpoena duces tecum, he has searched for any responsive documents which he had in his personal possession, on personal email accounts, social media, personal cell phone, handwritten notes or diaries, calendars, etc. and that he does not have any.
5. Enclosed please find the Amended Response to the Subpoena to Produce Documents.

We have made additional disclosures responsive to this Subpoena as identified in the Amended Responses.

After your review of the Amended Responses, please feel free to contact my office with any questions.

Truly yours,  
LAW OFFICE OF EDWAR A. ZEINEH, PLLC



Edward A. Zeineh

EAZ  
w/encl:

